

# EXHIBIT A

## Marin, Carlos

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**From:** O'Conner, Nick  
**Sent:** Wednesday, March 22, 2023 5:51 PM  
**To:** Marwan Daher  
**Cc:** Marin, Carlos; Van Hook, Abigail; Mohammed Badwan  
**Subject:** Johnson v. Wells Fargo (22cv00513) - Settlement Agreement

Marwan,

We've conferred with you many times in an effort to resolve this issue. We've now prepared a motion to enforce settlement that we intend to file if your client doesn't return the executed settlement agreement to us by close of business on Friday March 24, 2023. If we are forced to file the motion, we intend to ask the court for our attorney's fees. We sent the settlement agreement in October 2022 and have been as patient as possible. I have no doubt you understand our position.

Thanks,

Nicholas D. O'Conner  
[Locke Lord LLP](#)  
111 S. Wacker Dr.  
Chicago, IL 60606  
312.443.0494 Direct  
312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** O'Conner, Nick  
**Sent:** Monday, March 20, 2023 5:56 PM  
**To:** 'Marwan Daher' <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Thanks, Marwan. I can't make any more promises at this point but I appreciate the response. Hopefully it gets executed quickly.

Nicholas D. O'Conner  
[Locke Lord LLP](#)  
111 S. Wacker Dr.  
Chicago, IL 60606  
312.443.0494 Direct  
312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Sent:** Monday, March 20, 2023 4:53 PM  
**To:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Nick,

I hope all is well. She intends to sign but we do not control her. Last we heard (last Friday) is that she will sign by Friday. I understand if you need to file a motion but that won't make her sign any quicker.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109

Direct: (630) 537 – 1770

Fax: (630) 575 – 8188

Website: <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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---

**From:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Sent:** Monday, March 20, 2023 4:40 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

I need to hear from you on this one.

Thanks,

Nicholas D. O'Conner  
Locke Lord LLP  
111 S. Wacker Dr.  
Chicago, IL 60606  
312.443.0494 Direct  
312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** O'Conner, Nick  
**Sent:** Tuesday, March 14, 2023 4:46 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

Do you have the executed agreement?

Nicholas D. O'Conner  
Locke Lord LLP  
111 S. Wacker Dr.  
Chicago, IL 60606  
312.443.0494 Direct  
312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Sent:** Thursday, March 2, 2023 2:25 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** Re: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Thanks for the response. I can agree to 10 days. Please emphasize to your client that we can't have any hiccups. I'm running out of runway with my client.

Thanks,

Nicholas D. O'Conner  
Locke Lord LLP  
[111 S. Wacker Dr.](#)  
[Chicago, IL 60606](#)  
[312.443.0494](#)

On Mar 2, 2023, at 2:23 PM, Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)> wrote:

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Nick,

I hope all is well. We have sent two personal servers to her address to attempt to get Plaintiff to sign the documents. Each time she refused. However, in a recent call, she finally agreed to sign the documents. If you can hold off on another 10days it would be greatly appreciated. Thanks.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109

Direct: (630) 537 – 1770

Fax: (630) 575 – 8188

Website: <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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---

**From:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Sent:** Thursday, March 2, 2023 2:10 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

Following up here. If we're forced to file a motion, we're going to have to seek our fees. We've been bending over backwards here to avoid it. Please provide me with an update.

Thanks,

Nicholas D. O'Conner  
Locke Lord LLP  
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Chicago, IL 60606  
312.443.0494 Direct  
312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** O'Conner, Nick  
**Sent:** Wednesday, February 22, 2023 5:44 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Cc:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

What's the story on this one? I'm doing my best here but this is getting problematic. It's almost March.

Nicholas D. O'Conner  
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[www.lockelord.com](http://www.lockelord.com)

---

**From:** O'Conner, Nick  
**Sent:** Thursday, February 9, 2023 11:12 AM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Thanks, Marwan. As you can imagine, we really need to finalize this in short order.

Nicholas D. O'Conner  
**Locke Lord LLP**  
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312.896.6494 Fax  
[noconner@lockelord.com](mailto:noconner@lockelord.com)  
[www.lockelord.com](http://www.lockelord.com)

---

**From:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Sent:** Wednesday, February 8, 2023 10:50 AM  
**To:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Carlos,

I hope all is well. The problem is not finding Ms. Johnson, we found her last month. The issue is she is unwilling to agree to the terms of confidentiality and release. We're still trying our best here and should be able to circle back very soon.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109  
Direct: (630) 537 – 1770  
Fax: (630) 575 – 8188

Website: <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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---

**From:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>

**Sent:** Wednesday, February 8, 2023 10:48 AM

**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>

**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>

**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Hi Marwan,

Any updates here? We would like to hear any updates or start consider a dismissal if Ms. Johnson cannot be found.

Best,

Carlos

---

**From:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>

**Sent:** Tuesday, January 24, 2023 4:23 PM



**To:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Carlos,

I hope all is well. We're moving to plan Z here and are sending a process server to her home.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109

Direct: (630) 537 – 1770

Fax: (630) 575 – 8188

**Website:** <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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---

**From:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>  
**Sent:** Tuesday, January 24, 2023 4:21 PM  
**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Hi Marwan,

Any updates on this?

Best,

Carlos

---

**From:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Sent:** Wednesday, November 9, 2022 4:33 PM  
**To:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Carlos,

I am really trying over here. I can assure you that we're not sitting idle and are working with Mrs. Johnson on what seems like a daily basis to answer all her questions regarding the settlement agreement. We really hope to have it signed very soon. I appreciate your patience on this.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109  
Direct: (630) 537 – 1770  
Fax: (630) 575 – 8188

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---

**From:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>

**Sent:** Wednesday, November 9, 2022 4:29 PM

**To:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>

**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>

**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

We really need to get this through the finish line. Can you let us know when we can expect to receive a signed settlement?

Best,

Carlos

---

**From:** Marin, Carlos

**Sent:** Thursday, October 27, 2022 10:31 AM

**To:** 'Marwan Daher' <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; 'Mohammed Badwan' <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Hi Marwan,

I am following up about this. When can we expect to receive an executed copy with a W-9?

Best,

Carlos

---

**From:** Marin, Carlos  
**Sent:** Wednesday, October 12, 2022 10:12 AM  
**To:** 'Marwan Daher' <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; 'Mohammed Badwan' <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Hi Marwan,

I am following up regarding the settlement agreement below. I am attaching it again. Please return an executed copy along with an executed W-9.

Best,

Carlos

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**From:** Marin, Carlos  
**Sent:** Wednesday, October 5, 2022 3:32 PM  
**To:** 'Marwan Daher' <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>; Van Hook, Abigail <[Abigail.VanHook@Lockelord.com](mailto:Abigail.VanHook@Lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Marwan,

Attached find a draft of the settlement agreement. Please return an executed copy with a W-9.

Best,

Carlos

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**From:** Marwan Daher <[mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)>  
**Sent:** Thursday, September 1, 2022 11:30 AM  
**To:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hi Carlos,

We're settled. I will file a Notice of Settlement shortly.

Best Regards,

**Marwan R. Daher,**

Attorney at Law

Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue

Suite 200

Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109

Direct: (630) 537 – 1770

Fax: (630) 575 – 8188

Website: <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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**From:** Marwan Daher  
**Sent:** Wednesday, August 31, 2022 11:20 AM  
**To:** Marin, Carlos <[Carlos.Marin@lockelord.com](mailto:Carlos.Marin@lockelord.com)>; Van Hook, Abigail <[Abigail.VanHook@lockelord.com](mailto:Abigail.VanHook@lockelord.com)>; Mohammed Badwan <[mbadwan@sulaimanlaw.com](mailto:mbadwan@sulaimanlaw.com)>  
**Cc:** O'Conner, Nick <[noconner@lockelord.com](mailto:noconner@lockelord.com)>  
**Subject:** RE: Johnson v. Wells Fargo (22cv00513) - Defendant's Written Discovery

Hi Carlos,

I hope all is well. We should be resolved here by tomorrow. My client is leaning towards accepting the offer. Hold tight. Thanks.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148

Phone: (630) 575 – 8181, ext. 109

Direct: (630) 537 – 1770

Fax: (630) 575 – 8188

**Website:** <http://www.AtlasConsumerLaw.com>

Email: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com)



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## Marin, Carlos

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**From:** Marin, Carlos  
**Sent:** Friday, August 26, 2022 3:02 PM  
**To:** 'Marwan Daher'; Van Hook, Abigail  
**Cc:** O'Conner, Nick; Mohammed Badwan  
**Subject:** RE: 1:22-cv-00513-BMB Johnson v. Wells Fargo Bank, NA et al - Defendant's Written Offer

Marwan,

We conferred with our client, and Wells Fargo is willing to pay Plaintiff \$[REDACTED]. Wells Fargo is not willing to make a tradeline deletion or update of any kind. This offer is open until September 9, 2022. If Plaintiff does not accept this offer by then, the offer will be withdrawn and Wells Fargo will not make any offer to settle this case.

Best regards,

Carlos

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**From:** Marwan Daher <mdaher@sulaimanlaw.com>  
**Sent:** Thursday, August 25, 2022 4:00 PM  
**To:** Marin, Carlos <Carlos.Marin@lockelord.com>; Van Hook, Abigail <Abigail.VanHook@lockelord.com>  
**Cc:** O'Conner, Nick <noconner@lockelord.com>; Mohammed Badwan <mbadwan@sulaimanlaw.com>  
**Subject:** RE: 1:22-cv-00513-BMB Johnson v. Wells Fargo Bank, NA et al - Defendant's Written Offer  
**Importance:** High

**\*\* External Email -- Sender: [mdaher@sulaimanlaw.com](mailto:mdaher@sulaimanlaw.com) \*\***

Hello Carlos and Abigail,

I hope all is well and pleasure speaking with you today. I have authority to come down to \$[REDACTED], including a request to update the Wells Fargo tradeline to remove the 30-day late notation. As you know, this is a unilateral move as a show of good faith to try and resolve this short of protracted litigation that is ahead of both parties.

Moreover, to provide the parties time to attempt to resolve this, please advise if Wells Fargo will agree to an extension of time up to and including September 6, 2022 (September 5, 2022 is Labor Day). Thank you in advance for your professional courtesy.

Best Regards,

**Marwan R. Daher,**  
Attorney at Law  
Atlas Consumer Law – a Division of Sulaiman Law Ltd.

2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148